

Wednesday 5<sup>th</sup> December, 2007

The Project Officer  
Kosciuszko National Park  
Draft Horse Management Plan  
National Parks and Wildlife Service  
PO Box 472  
Tumut NSW 2720

Dear Sir/Madam,

### **Submission on the draft horse management plan 2007**

The Colong Foundation supports increased efforts to control feral horses in Kosciuszko National Park. The Foundation is concerned that many areas of the park are being degraded by feral horses.

The reader of the draft report is confused when the term wild horse is used 15 times and feral horse is mentioned 22 times in the text. The reader may conclude that wild horses and feral horses are different types of horse populations.

The Colong Foundation would prefer that feral horse is used consistently throughout the report and the term 'wild horse' be used inside inverted commas when quoted. The term 'wild horse' can confuse horses with native wildlife. As you would appreciate, horses are feral in Kosciuszko National Park because they comprise populations arising from domestic stock that have gone wild.

### **Horse damage is an observable reality**

The Colong Foundation disagrees with the Snowy Mountains Horse Riders and the Snowy Mountains Bush Users Group regarding maintenance of feral horse populations in national parks. Bush Users Group state in a well circulated form letter submission that feral horses cause little damage to the natural environment. Damage to the park by feral horses, however, is well documented and referenced in the draft report. Any community group position that does not accommodate good evidence or provide other evidence supporting their position should be considered unrealistic.

The BUG form letter states that the damage to the park is temporary and short term in nature. These claims ignores the biological and arithmetic facts presented in the draft report. Feral horse populations will continue to grow until a point of dynamic equilibrium with the natural environment. Before that point is reached, however, the park will be degraded by overgrazing, followed by soil erosion and weed infestation.

Last Christmas I visited the Goobragandra Wilderness and was greatly concerned by the damage that feral horses cause to this area. The attached letter by Mr and Ms Gye to the former Minister for the Environment, the Hon Bob Debus, sought greater efforts for the removal of feral horses from the park. The letter further documents recent observations on the extent of the damage to that area.

### **Sustained horse populations are not consistent with the Act or management plan**

Some pro-horse activists believe that the park should be well stocked with horses. The adjoining Long Plain area is also subject to protests from those who believe that cattle drives should continue in the park. These objections when taken together describe a form of park management that benefits exotic animals before native wildlife.

The Colong Foundation is disappointed by the BUG form letter submission. The form letter seeks to gain public support for the view that National Parks and Wildlife would control feral horses for purposes other than the limitation of environmental impacts. Such campaigning is offensive to the traditions and professionalism of the Service. These sorts of attacks are unfair because public servants cannot defend themselves from unjustified criticisms of this nature.

By casting of aspersions and attacks on the Service, the pro-horse lobby apparently seek to discredit the recommendations of the draft horse plan and win support for an alternative vision. The pro-horse vision seeks to establish an agreed level of a feral horses in the national park. Such a policy position would turn pest species management, and the primary conservation purpose of national parks, on its head.

The draft plan's horse exclusion from key areas policy should be unobjectionable to the pro-horse lobby, and come as no surprise at all considering policy directions contained in the plan of management. The draft plan will be laborious and resource demanding to implement. The policy offers no adequate means to protect the natural values in remote areas such as in the Pilot Wilderness. For the pro-horse lobby to claim that the Service is not accommodating their concerns after this expensive and exhausting planning effort is also unfair and unreasonable.

The *National Parks and Wildlife Act 1974* defines the management principles for a national park. These include the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena and the maintenance of natural landscapes. The maintenance of feral horse populations would be contrary to the above management principle that would need amendment before the BUGs vision could proceed.

The Kosciuszko National Park Plan of Management calls for the exclusion of horses from key areas and for a Feral Horse Management Plan to be prepared for the whole of the Park. The plan of management would also need amendment before a specified level of feral horses could be maintained in the park.

The Colong Foundation considers the draft policy in the feral horse plan to be the absolute minimum acceptable level of management response, due to the damage that horses cause. The draft plan only partly satisfies the management principles of the Act. It would be better for the draft plan to have adopted a draft plan that sought to eradicate feral horses as an ultimate goal. Such a goal could help limit the geographic spread of the Equine influenza virus, and so should not be considered as an anti-horse policy.

There are also public safety risks from not eradicating feral horses. Failure to eradicate feral horses near public roads would leave DECC open to a litigation risk when there is a serious vehicle collision with a feral horse.

It would appear that the horse lobby is using the age-old ploy of describing the draft policy as a political loss to their interests when it is a significant gain. The draft horse plan is a victory for the pro-horse lobby as feral horses would not be eradicated through its implementation across the entire park. The pro-horse lobby have presented this victory as a loss apparently to establish the grounds for its next round of park management compromises. The Service should not grant concessions in the face of such misleading manipulation of public opinion. If they give in, then a race to the bottom commences amongst the self interested who want parks managed for their group's benefit, instead of for nature.

### **Improve option assessment**

The draft management plan states that feral horse management is not new. The draft plan, however, fails by not making best use of the reasoned assessment of the horse control methods presented. The draft plan should select by due process the preferred suite of management actions based on the available evidence.

An adequately detailed draft plan should propose what is going to happen and where, or at the very least specify a narrow range of options and show how they are to be deployed across the park.

The risk of not selecting preferred methods is that more expensive and less humane methods could be chosen that do not reduce population levels.

The current proposed efforts may fall into the more expensive and less humane category if major improvements to current practice are not adopted. Only 206 horses were captured from 2002 to 2006 and even the 64 horses captures in the 2006/2007 summer would not reduce horse populations.

Multiplying the conservative population growth estimate (8 per cent) by the population (about 1715) gives conservative annual increase 137 horses. The actual growth is probably more like 200 horses as horse numbers in remoter wilderness areas were omitted from the estimate and the park horse populations would be on the rapid rebound to fill the core habitat after wildfire.

The draft management plan should not use methods proven to be ineffective in Kosciusko National Park and in Guy Fawkes National Parks.

The inadequacy of the current methods should be clearly stated in the horse management plan. The general community and decision makers should consider that existing methods are ineffective and through the narrative of the report be encouraged to select better options.

There is a lot of hot air generated over 'adaptive management', but the advocates of this form of management must ensure strong and effective feedback loops to decision makers and the community.

The DECC should communicate the intended effective actions of the horse plan. It should explain that aerial shooting is the most effective, cost efficient and humane method of controlling feral horses. It should seek to bring public opinion around to supporting more effective management by providing considered information.

Ms Fiona McCrossin explained that 'A minimum on-park population, which must approach zero, should be achieved in a humane way, in the shortest possible period of time. The method should recognise the positions of other agencies and independent scientific bodies. This method is aerial shooting.' These conclusions are as relevant today as they were in 2003. The community should be presented with the considered information by Dr Tony English that supports the feral horse eradication.

The Foundation is pleased that the draft plan has well explained that land managers of many different political backgrounds regularly shoot horses in all parts of the continent to control feral horse numbers. The report also explains that many the graziers who once used the High Country also shot horses when horse numbers competed with stock. Such remarks help remind the pro-horse lobby that they are viewing their cultural memories through rose coloured glasses.

### **Evaluation of management options**

As described above, the current approaches are unlikely to stop horse numbers increasing. Although the draft plan does not specify future control strategies, these strategies need to be constantly assessed to determine success.

The evaluation methods specified in the draft report should focus on the key issue; whether the management will reduce horse numbers in key areas. The draft plan is wrong to consider

the number of horses removed that as a measure of success. Rather success is achieved with the annual rate of horse removal (from death and export) is greater than the increase (from birth rate and immigration). This is basic information would not be obtained by implementing the draft plan.

The draft feral horse policy, unfortunately, must have a high probability of failure because monitoring does not collect information on population dynamics. A successful control strategy should be defined as one that reduces the feral horse population to zero in the shortest time, subject to all the other policy constraints. Monitoring should be constructed to reflect this policy framework.

The unintended goal of the draft policy may well be the maintenance, or slow increase, in horse herds at great expense, perhaps for the benefit of only the contractors and the pro-horse lobby. (This was the experience at Guy Fawkes National Park, where ineffective mustering was undertaken for many years.)

Monitoring as currently presented in the draft plan considers all aspects of the program as equal factors. The essential monitoring test for any control approach should be against the population reduction goal but on this key consideration the draft plan is silent.

Monitoring should also extend to the description and mapping of both the damage and core feral horse habitat areas. Quantitative records of core habitat and disturbance areas should not be for research partnerships alone, but part of the management plan evaluation program. Such mapping should inform the pest control task by identification of priority action areas. I am sure such evaluation would be done, even if it is not formalised. The feral horse management plan should develop a transparent program that develops a useful data base to inform future actions, as does effective fire management currently.

#### **Key area strategy should be tested as a priority**

The biggest risk with the key area approach is that the immigration of feral horses from other core habitat areas outside chosen key areas may remain high. If immigration into key areas remains high, then the key area strategy in the park plan of management would fail. Such population dynamics should be monitored to understand the on-ground situation. It may be necessary to review key area selection and co-operation with off-park management to insure that feral horse immigration and emmigration is reduced.

The draft plan is does not test the recommended actions against the goal of reducing feral horse populations (in key areas or across the park). This omission will make it impossible to ascertain, at some future date, whether the draft horse plan has meet the policy directions in the park plan of management. It is also not possible to determine whether the key area strategy is the best approach or whether some other approach focussed on core feral horse habitat strategy would be better.

Thank you for the opportunity to make a submission to the 2007 draft feral horse management plan. A copy of Ms McCrossin's 2003 submission on the Wild Horse Management Plan is also attached for its excellent presentation of the case for reinstating humane aerial shooting of feral horses across the entire park.

Sincerely,

Keith Muir  
Director